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6	UNITED STATES DISTRICT COURT	
7	DISTRICT OF NEVADA	
8		
9	UNITED STATES OF AMERICA,) Case No. 2:22-cr-00035-APG-VCF-1
	Plaintiff,	\
10	vs.) EMERGENCY MOTION TO SUSPEND
11		PRETRIAL TRAVEL RESTRICTION TO
12) PERMIT TRAVEL TO CALIFORNIA FROM OCTOBER 5, 2002 THROUGH OCTOBER 7,
13		2022
	CARL STEPHEN YEBES,	Ś
14	Defendant.	(First Request)
15		3
16		

Carl Yebes is currently on pretrial release pending his sentencing in this case. Mr. Yebes' pretrial release conditions include a restriction to the State of Nevada, whereas in many other cases Mr. Yebes would have his travel restricted solely within the confines of the continental United States. Mr. Yebes has a preplanned trip to California that has already been paid in full and Mr. Yebes had previously communicated this to his Pretrial Services Officer Angela Loveless.

Unfortunately, until very recently, all parties were under the impression no motion would be required to facilitate this travel request as it was believed Mr. Yebes could travel without prior approval within the continental United States. Upon learning that this relief would be required, counsel acted as quickly as possible to bring this matter before the Court to attempt to obtain the relief required to enable Mr. Yebes to travel as previously planned.

Undersigned counsel has conferred with the United States Pretrial Services Office and has communicated directly with United States Pretrial Services Officer Angela Loveless and can attest that the

Pretrial Services Office has no objection or opposition to this requested relief.

Mr. Yebes gratefully appreciates the Court's prompt attention to this matter and looks forward to resolution as expeditiously as possible in hopes of maintaining the travel plans he had previously made. The lodging and many other travel expenses have already been incurred and are primarily non-refundable in nature.

DATED this 4th day of October, 2022.

/s/ Mace J. Yampolsky, Esq.
MACE J. YAMPOLSKY, ESQ.
Counsel for Defendant

ORDER

Based upon the foregoing, and good cause appearing, it is hereby ordered that the pretrial travel restriction confining Mr. Yebes to travel within and throughout the State of Nevada exclusively be temporarily suspended for the time period of October 5th through October 7th, 2022, to permit his preplanned trip to California as scheduled.

Dated: October 5, 2022

DISTRICT COURT JUDGE